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July 30, 2008

The Honorable Joseph J. Farnan, Jr.
J. Caleb Boggs Federal Building
844 N. King Street, Room 4124
Wilmington, DE 19801

Re: *LG.Philips LCD Co., Ltd. v. Chi Mei Optoelectronics et al*,
Case Nos. 06-726-JJF and 07-357-JJF

Dear Judge Farnan:

I write on behalf of plaintiff LG Display Co., Ltd. ("LGD") in response to Mr. Rovner's letter to the Court of this morning (D.I. 364).

Because it may not be apparent from the numerous e-mails and letters, the precise issue here is whether CMO should implement the following additional safeguards (i.e., in addition to the safeguards already in both versions of the proposed protective orders) with respect to LGD's highly confidential product design files, as LGD has already implemented with respect to CMO's product design files:

- (i) maintaining the non-networked computers on which these files may be viewed in a locked office or conference room in outside counsel's offices;
- (ii) maintaining the files in a locked drawer inside the locked conference room;
- (iii) limiting access to the locked room only to those attorneys and others who are permitted to review highly confidential files;
- (iv) providing in advance a list of all attorneys and experts who will review those files; and
- (v) returning the files at the end of the case.



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Because the same types of files are being exchanged by LGD, AUO and CMO, and because LGD, AUO, and CMO are all direct competitors, LGD believes that all parties should abide by the Court's July 7 order.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Richard D. Kirk', written in a cursive style.

Richard D. Kirk (rk0922)

cc: Counsel as shown on the attached certificate

CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on July 30, 2008, he served the foregoing documents by email and by hand upon the following counsel:

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The undersigned counsel further certifies that, on July 30, 2008, he served the foregoing documents by email and by U.S. Mail upon the following counsel:

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/s/ Richard D. Kirk, (rk0922)
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